

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
FY2014-2015 DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN  
(ARDP)**

**State Fiscal Years 2014 (July 1, 2013 to June 30, 2014) and 2015 (July 1, 2014 to June 30, 2015)**

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Not all state Public Water System Supervision (PWSS) programs have access to enough resources to implement all of the provisions of existing drinking water regulations, and other primacy program requirements. Therefore, we need to plan for circumstances where resources are inadequate to implement the entire drinking water protection program. Since the purpose of the Safe Drinking Water Act (SDWA) is to protect public health, federal and state agencies have an obligation to ensure that limited resources are deployed in a way that ensures maximum health protection benefit, and that we collectively keep track of what is and is not being done as we strive for full implementation.

The plan documents what will and will not be done during the year. The agreement reflects state capacity based on available resources, as well as local health protection priorities. Core activities, such as explaining regulation requirements to public water supplies, and tracking and reporting violations, are fundamental to the integrity of the public health protection program and are not amenable to priority setting. U.S. EPA will participate and support state implementation efforts where appropriate and possible. U.S. EPA commitments in support of state programs are listed in the table.

The state and U.S. EPA will both report annually on their accomplishments so we can jointly appraise our effectiveness, and our progress toward implementing the complete program. Where resource shortfalls continue to exist, the state and EPA will simultaneously continue efforts to obtain additional resources in order to fill the resource gap. State and EPA efforts to obtain additional resources necessary to fill the gaps associated with temporarily disinvested activities will be documented in the end-of-year evaluation reports.

Using this resource deployment plan as a framework for annual planning and progress assessment should meet several objectives:

- (1) Promote clear understanding of both state and U.S. EPA commitments.
- (2) Minimize ad hoc requests for program reporting.
- (3) Promote judicious use of limited resources to achieve the best possible public health protection.
- (4) Support efforts to increase resources by clearly identifying resource and program constraints.
- (5) Promote collaborative inter-agency program planning and implementation.

## **PUBLIC WATER SYSTEM SUPERVISION PROGRAM CORE STATE ACTIVITIES**

- ⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that states must expand their labs to perform all the analyses. At a minimum, a state should have an adequate certification program to certify commercial labs within the state.
- ⇒ Maintain a data management system that tracks requirements for all rules. This means to have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
- ⇒ Keep adequate records of pertinent state decisions.
- ⇒ Adopt all rules in a timely manner (within two year extension period).
- ⇒ Notify all systems of regulatory requirements and respond to questions.
- ⇒ Determine violations for all rules and report to U.S. EPA.<sup>1</sup>
- ⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
- ⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.

<sup>1</sup> States must report actions and sample data quarterly and inventory data at least annually in accordance with 40 C.F.R. 140.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. The reporting schedule for States to the national database, SDWIS/FED-ODS, is as follows: FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15. If the data is not reported within 60 days, the Region will raise the issue to the State Director's attention.

***CORE R5 ACTIVITIES***

- ⇒ Respond to questions from our state programs about regulations. Train state staff about regulations by offering in-state and/or regional training opportunities.
- ⇒ Maintain a forum for U.S. EPA and state communications through the monthly U.S. EPA and state conference calls, holding an annual meeting, and conducting additional meetings/calls as needed.
- ⇒ Determine whether primacy applications are completed, track primacy submittal/review for all rules, and provide comments on draft rules, as requested.
- ⇒ Communicate and track reporting required for new rules by state.
- ⇒ Assist states in acquiring resources to carry out all functions of the PWSS program.
- ⇒ Monitor specific regulations related to state follow-up to the findings of the last data and enforcement verification reports, as indicated in the “R5 Activities” column.

<b>Acronyms/Abbreviations</b>	
ACS – Annual Commitment System ARDP – Annual Resource Deployment Plan CCR – Consumer Confidence Report C.F.R. – Code of Federal Regulations CPE – Comprehensive Performance Evaluation CTA – Comprehensive Technical Assistance CWS – Community Water System DBP – Disinfection By-Products D/DBPR – Disinfectants and Disinfection By-Products Rule DWSRF – Drinking Water State Revolving Fund eDV – Electronic Data Verification (Tool) ERG – Expense Reimbursement Grant ERP – Enforcement Response Policy ETT – ERP Enforcement Targeting Tool FBRR – Filter Backwash Recycling Rule GWR – Ground Water Rule GWS – Ground Water System GUDI – Ground Water under the Direct Influence of Surface Water IESWTR – Interim Enhanced Surface Water Treatment Rule IOC – Inorganic Contaminant LCR – Lead and Copper Rule LT1ESWTR – Long-Term 1 Enhanced Surface Water Treatment Rule LT2ESWTR – Long-Term 2 Enhanced Surface Water Treatment Rule MCL – Maximum Contaminant Level M/R – Monitoring/Reporting MRDL – Maximum Residual Disinfectant Level	MRDL – Maximum Residual Disinfectant Level NCWS – Non-Community Water System NPDWR – National Primary Drinking Water Regulation NPDWR CDVRT – Compliance Determination and Violation/Enforcement Reporting Tool NTNCWS – Non-Transient Non-Community Water System OCCT – Optimal Corrosion Control Treatment PN – Public Notification PWS – Public Water System PWSID – Public Water System Identification PWSS – Public Water System Supervision SDWA – Safe Drinking Water Act SDWIS/FED – Safe Drinking Water Information System/Federal SDWIS/State – Safe Drinking Water Information System/State SOC – Synthetic Organic Contaminant SOX – “SOX” is a code in SDWIS/FED that indicates the state entered a return to compliance for a violation SPM – U.S. EPA Region 5 Ground Water and Drinking Water Branch State Program Manager Stage 2 – The Stage 2 Disinfectants and Disinfection By-Products Rule SWI – Sustainable Water Infrastructure SWP – Source Water Protection SWTR – Surface Water Treatment Rule TCR – Total Coliform Rule TMDL – Total Maximum Daily Load TT – Treatment Technique VOC – Volatile Organic Contaminant

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Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>1.1 – Submit primacy revisions as necessary.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>Indiana adopted the subject rules on the following dates:</p> <p>FBRR: 12/1/02  SWTR: 6/29/1993  IESWTR: 12/1/02  LT1SWTR: 1/12/05  LT2SWTR: 6/6/10 (Primacy application for LT2ESWTR was submitted to EPA R5 in May 2011)</p>	<p>Indiana was awarded primacy for the subject rules on the following dates:</p> <p>FBRR: 4/8/13  SWTR: 8/30/1993  IESWTR: 4/8/13  LT1ESWTR: 6/29/07  LT2ESWTR: Not yet awarded</p> <p>Respond to questions about surface water treatment rules.</p> <p>Process the LT2ESWTR primacy application. Track progress.</p>	<p>Requested revisions to LT2ESWTR are being made with our RTCR rulemaking.</p> <p>R5 EPA responded to LT2 Rule development and implementation questions.</p> <p>Once IDEM Rules staff determine how to proceed with final RTCR, the requested changes will be included with that rulemaking.</p> <p>R5 confirms that State performance is satisfactory.</p>
1.2 – Notify all surface water and GUDI systems of their LT2 regulatory requirements.	IDEM DWB has provided on-site training for all affected PWS. Training for the affected LT2 system is complete. Systems are up to date on the submittal of early implementation requirements.	EPA R5 has provided notification to the systems. As requested, promote understanding of surface water treatment regulations by conducting presentations at state water industry organization functions.	Systems are being reminded of requirements as 2 <sup>nd</sup> round Cryptosporidium testing approaches.
1.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules.	IDEM-DWB utilizes SDWIS to track all requirements of the rules including violations and enforcement. The IESWTR and the LT1ESWTR rules were tracked using SDWIS since 1/2005.		<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA confirms that IDEM maintains a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules. .</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all surface water systems.	Violations and enforcement actions will be reported to SDWIS/FED quarterly via SDWIS/State migration software.	R5 will evaluate the extent to which LT2 violations are reported to SDWIS/FED.	Ongoing activity, meeting commitment.  R5 EPA confirms that IDEM met its all of its electronic reporting commitments.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
<p>1.5 – Conduct and report sanitary surveys at surface water (40 C.F.R. Part 141 Subpart H) systems. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection (SWP) and Sustainable Water Infrastructure (SWI) activities (see section 4.0 of the “other activities” table and section 1.0 of the “national and regional EPA priorities” table below, respectively).</p>	Sanitary surveys will be conducted as required and SDWIS entry done as part of an ongoing program.	<p>Provide training, as requested.</p> <p>R5 will measure completeness of sanitary surveys within evaluation time period (three or five years). This national measure will be measured again in July 2013 for the period of 2010 to 2012 and in July 2014 for the period of 2011 to 2013.</p>	<p>A total of 56 surveys were completed at SW and SWP systems. Of those 56, 2 were late, and they were completed within 15 days of their anniversary date.</p> <p>As of February 2016, Region 5 could not accurately verify this information. Region 5 will work with IDEM to develop a verification protocol by June 2016.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.6 – Ensure that all surface water and GUDI systems that notify the State that they recycle spent filter backwash water, thickener supernatant, or liquids from dewatering processes, return these flows through the processes of a system's existing conventional or direct filtration system, or at alternate location approved by the State.	DWB approves and tracks all requirements of FBR for all surface water systems.		Compliance with the filter backwash rule is checked as part of sanitary surveys.  R5 EPA was unable to verify this activity.
1.7 – Use sanitary surveys, CPEs, other inspections, or other activities to evaluate recycled backwash water practices when they occur at surface water and GUDI systems. When those practices are not in compliance with the FBRR require the system to modify the practices to achieve compliance.	Sanitary surveys will evaluate backwash practices and note any deficiencies found during inspections. Follow-up activities will be conducted to ensure that deficiencies are addressed. Enforcement actions will be initiated if necessary.		Compliance with the filter backwash rule is checked as part of sanitary surveys.  R5 EPA was unable to verify this activity.
1.8 – Ensure that filter/disinfection practices are adequate to achieve inactivation/removal requirements for regulated microbial contaminants found in surface water sources.	Sanitary surveys will note any deficiencies found during inspections. Follow-up activities will be conducted to ensure that deficiencies are addressed. Enforcement actions will be initiated if necessary.		Ongoing activity, meeting commitment.  R5 EPA was unable to verify this activity.
1.9 – Follow-up on turbidity TT and individual filter turbidity M/R violations. a. Track individual filter turbidity	This is routinely done. Violation letters will be issued to PWSs if there is any violation, and Field Inspectors will make follow-up	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment. Violation and enforcement actions made are also made available at IDEM's Drinking



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
trigger exceedances. <b>b.</b> Track completion of individual filter turbidity profiles for systems exceeding individual filter triggering criteria.	visits providing technical assistance. PWSs with individual filter TT violations are identified monthly, issued a violation letter and the PWS is required to perform a filter profile. Once the filter profile is submitted, it is reviewed in accordance with the rule requirement.		Water Watch (DWW) web site. Once follow-ups were made and the PWS has made the appropriate action and return to compliance, SOX code is made to the violation and can be seen at IDEM's DWW website immediately.  R5 EPA was unable to verify this activity.
1.10 – When required by rule: (a) track the completion of CPE/CTA for PWSs and (b) ensure that disinfection profiling and benchmarking is conducted.	If any PWS is required to perform a CPE/CTA, the final report will be reviewed to ensure that the solutions are completed and will return the PWS to compliance. A field visit will be made if necessary.		No CPE/CTA was done in this FY. No disinfection profiling and benchmarking were done either.  R5 EPA was unable to verify this activity.
1.11 – Ensure that a residual disinfectant concentration is measured according to rule requirements.	Disinfectant residual results are submitted for review for both SWTR and DBPR requirements.		Ongoing activity, meeting commitment.  Residual disinfection concentration of PWSs are available to be viewed at IDEM's DWW website.  R5 EPA was unable to verify this activity.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR</b>			
1.12 – Follow-up on disinfection residual TT and M/R violations.	This activity is routinely done. Violation letters will be issued to PWSs and Field Inspectors make follow-up visits providing technical assistance if necessary. Any violation of the monitoring and reporting requirements will be issued a violation letter followed by appropriate Field Inspection or other contact.	Region 5 will assist as necessary, or as requested	Ongoing activity, meeting commitment.  Violations made for this rule can be viewed at IDEM DWW website. Also, if there is any violation of this type, it is reported to SDWIS/FED on a quarterly basis. If violation is resolved, return to compliance code, SOX, is also made available at IDEM's DWW website.  R5 EPA was unable to verify this activity.
1.13 – Report treatment data (e.g., treatment codes for all surface water, GUDI, and purchased GUDI sources, seller's PWSID number for purchased surface water and purchased GUDI sources, etc.)	This data will continue to be reported to SDWIS as information is obtained. Treatment data continues to be incorporated into SDWIS.		Ongoing activity, meeting commitment.  Treatment and distribution information is now being updated in SDWIS from each sanitary survey.  R5 EPA was unable to verify this activity.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Total Coliform Rule</b>			
<p>2.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>The total coliform rule was adopted on 6/29/1993.</p> <p>The Revised Total Coliform Rule (RTCR) is projected to be adopted on January 2016.</p> <p>IDEM-DWB utilizes SDWIS to track all requirements of the TCR rules including violations and enforcement.</p>	<p>IDEM received primacy for the TCR on 8/30/1993</p>	<p>IDEM fully utilized the SDWIS TCR NCD module for compliance daily.</p> <p>R5 EPA confirms that IDEM maintains a data base management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR.</p>
<p>2.2 – Electronically report all TCR MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.</p>	<p>Currently, all violations, enforcement and inventory updates for TCR are reported to SDWIS quarterly.</p>		<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA confirms that IDEM met its all of its electronic reporting commitments.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Total Coliform Rule</b>			
2.3 – Follow-up on all MCL and M/R violations and determine a proper course of action to ensure public health protection.	After an MCL violation, a letter is sent to the PWS in violation. Field Inspectors are given copies of the letters. Follow-up calls or on-site visits by the Field Staff will be performed. The follow-up to determine the adequacy of the systems' action will depend on the type of system and population served and the availability of resources at IDEM.	Region 5 will assist as necessary, or as requested.	<p>Routinely done, commitment being met. This is a high priority for Field staff. They were able to call or visit all systems to follow-up on MCL violations.</p> <p>Violations made for this rule can be viewed at IDEM DWW website. Also, if there is any violation of this type, it is reported to SDWIS/FED on a quarterly basis. If violation is resolved, return to compliance code, SOX, is also made available at IDEM's DWW website.</p> <p>R5 EPA was unable to verify this activity.</p>
<p>2.4 – Ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of SWP and SWI activities (see section 4.0 of the “other activities” table and section 1.0 of the “national and regional EPA priorities” table below, respectively).</p>	<p>Sanitary surveys will be conducted at required frequency as an ongoing program*. Inspection information is being entered and tracked in SDWIS.</p> <p>*IDEM continues to experience turnover in the staff that perform sanitary surveys. We face challenges in training new staff and getting them up to speed to perform surveys in competent manner. We will be challenged to perform all sanitary surveys at a frequency specified in rules.</p>		<p>A total of 2204 sanitary surveys were completed. Of those, 43 were late. Some of these were due to lack of access, and letters were sent to the owners requiring entry. The majority of the systems were less than 30 days past the anniversary date of the last survey.</p> <p>As of February 2016, Region 5 could not accurately verify this information. Region 5 will work with IDEM to develop a verification protocol by June 2016.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Total Coliform Rule</b>			
2.5 – Plan for the transition from TCR to the Revised Total Coliform Rule (RTCR). Ensure that adequate resources are dedicated and that State rule implementation will begin by April 1, 2016.	IDEM continues to plan the implementation of RTCR before the rule becomes effective April 2016. The plan includes resource issues both for compliance and inspection activities. Further, all applicable training will be attended to ensure adequate staff knowledge for the transition. We believe implementing RTCR at NCWSs will be a serious challenge for us.	Region 5 EPA will provide webinar rule training.	<p>Planning has focused on the startup procedures for seasonal systems and sampling plans at TNCWS. The DW Branch created an RTCR group that meets regularly to ensure that the transition in meeting the RTCR due date of April 1, 2016 will be fully implemented.</p> <p>In 2014 and 2015, EPA-HQ provided RTCR training webinars and Region 5 answered fielded and answered RTCR rule development and implementation questions from IDEM. It has been mutually agreed that this method fills the State need and the R5 obligation. It is anticipated that no additional future workshops or webinars are needed.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
<p>3.1 – Submit primacy revisions as necessary.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>The Ground Water Rule became effective in Indiana on June 6, 2010 and is being revised to address EPA comments. IDEM projects revised GWR adoption by mid-2014.</p> <p>The initial primacy application for the GWR was received by EPA on May 9, 2011.</p>	<p>R5 will complete its review of the IDEM primacy application and announce a stringency determination following the receipt of a final revised rule</p>	<p>Requested revisions to the GWR are being made with the RTCR rulemaking.</p> <p>Once IDEM Rules staff determine how to proceed with final RTCR, the requested changes will be included with that rulemaking.</p> <p>R5 did not have the opportunity to conduct a final review or announce a primacy determination for the GWR during the performance period.</p>
<p>3.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.</p>	<p>The GWR data base is maintained using SDWIS/State. IDEM will relay to Region 5 any issues with limited SDWIS/State rule tracking functionality.</p>	<p>Region 5 commits to communicate any issues IDEM has with limited SDWIS/State rule tracking functionality to HQ via the national GWR workgroup.</p>	<p>IDEM fully utilized the SDWIS TCR NCD module with GWR capability for compliance daily.</p> <p>R5 EPA confirms that IDEM maintains a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.3 – Electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	All violations, enforcement and inventory updates for GWR will be reported to SDWIS quarterly.	R5 will evaluate the extent to which GWR violations are reported to SDWIS/FED.	<p>Ongoing activity, meeting commitment.</p> <p>Violations made for this rule can be viewed at IDEM DWW website. Also, if there is any violation of this type, it is reported to SDWIS/FED on a quarterly basis. If violation is resolved, return to compliance code, SOX, is also made available at IDEM's DWW website.</p> <p>The October 2015 data freeze found that IDEM reported 331 GW M/R and 7 GWR TT violations during the 7/1/14 to 6/30/15 period.</p> <p>R5 EPA confirms that IDEM met all of its electronic reporting commitments.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
<p>3.4 – Conduct and report sanitary surveys that meet requirements by 12/31/12 at CWSs and then every 3 years thereafter, and by 12/31/14 at NCWSs served by a groundwater source and then every 5 years thereafter. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of SWP and SWI activities (see section 4.0 of the “other activities” table and section 1.0 of the “national and regional EPA priorities” table below, respectively).</p>	<p>Sanitary surveys will be conducted at required frequency as an ongoing program.*</p> <p>Sanitary Surveys will be reported to SDWIS regularly.</p> <p>*IDEM continues to experience turnover in the staff that perform sanitary surveys. We face challenges in training new staff and getting them up to speed to perform surveys in competent manner. We will be challenged to perform all sanitary surveys at a frequency specified in rules.</p>	<p>R5 will measure completeness of ground water sanitary surveys within evaluation time period (three or five years).</p>	<p>A total of 2204 sanitary surveys were completed. Of those, 43 were late. Some of these were due to lack of access, and letters were sent to the owners requiring entry. The majority of the systems were less than 30 days past the anniversary date of the last survey.</p> <p>As of February 2016, Region 5 could not accurately verify this information. Region 5 will work with IDEM to develop a verification protocol by June 2016.</p>



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.5 – Ensure that GWSs that must treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.	GWSs that must treat to the 4-log virus removal/inactivation standard were issued an approval letter requiring the system to have chlorine residual monitoring device for continuous testing or grab sampling on small systems (3300 population or less). Systems are required to submit monthly reports of operation ensuring that the required minimum residual is met daily.		Ongoing activity, meeting commitment.  R5 EPA was unable to verify this activity
3.6 – Determine appropriate corrective actions in consultation with GWSs that collect fecal indicator-positive source water sample(s) or that have significant deficiencies.	GWSs that have fecal indicator-positive source water samples are required to collect 5 additional samples within 24 hours. If any of the results is fecal positive, the system will be required to either: provide treatment (to be on compliance schedule), find other source, provide bottle water, or, on cases found during sanitary survey, to remove any potential sources of contaminants.		Ongoing activity, meeting commitment.  R5 EPA was unable to verify this activity
3.7 – Determine if optional source water monitoring will be used. If so, apply monitoring requirements to selected systems.	Optional source water monitoring will be used if there's history of violation Otherwise, see 3.7 above.		Ongoing activity, meeting commitment.  R5 EPA was unable to verify this activity.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Ground Water Rule</b>			
3.8 – Follow-up on, and return to compliance: (a) corrective action consultation and reporting violations, (b) TT violations, (c) M/R violations, (d) public notification violations, and (e) other discovered recordkeeping/reporting violations.	<p>Corrective actions outside of sanitary survey deficiencies are handled through formal enforcement actions.</p> <p>All M/R violations are issued a violation letter after the end of the reporting period.</p> <p>Follow up on systems that failed to issue a PN will be prioritized based on available resources.</p> <p>All discovered recordkeeping/reporting violations are issued violation letter after the end of the reporting period.</p>	Region 5 EPA will assist as necessary, or as requested.	<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA was unable to verify this activity.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Nitrate and Nitrite</b>			
<p>4.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and tracks nitrate/nitrite violations.</p> <p><a href="#"><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></a></p>	Nitrate/nitrite compliance is tracked using SDWIS/State.		<p>IDEM fully utilized the SDWIS CDS module for daily compliance with the nitrate/nitrite rule.</p> <p>R5 EPA confirms that IDEM is utilizing SDWIS CDS for nitrate/nitrate rule tracking.</p>
4.2 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	All violations, enforcement and inventory updates are reported to SDWIS quarterly.		<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA confirms that IDEM met all of its electronic reporting commitments.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Nitrate and Nitrite</b>			
4.3 – Follow-up on all MCL and M/R violations and determine a proper course of action to ensure public health protection.	<p>After an MCL violation, a letter is sent to the PWS in violation. Field Inspectors are given copies of the letters. Follow-up calls or on-site visits by the Field Staff will be performed. The follow-up to determine the adequacy of the systems' action will depend on the type of system and population served and the availability of resources at IDEM.</p> <p>All M/R violations are issued a violation letter after the end of the reporting period including day care and schools. SDWIS provides the necessary candidate violations and staff does the validation of all the violations.</p>	Region 5 will assist as necessary, or as requested.	<p>Ongoing activity, met commitment. Field Staff performed a site visit for all acute MCL violations. Technical assistance calls may be made to systems with MCLs for chronic contaminant violations and on-site visits were made when circumstances warranted it. Violations made for this rule can be viewed at IDEM DWW website. Also, if there is any violation of this type, it is reported to SDWIS/FED on a quarterly basis. If violation is resolved, return to compliance code, SOX, is also made available at IDEM's DWW website.</p> <p>R5 EPA was unable to verify this activity.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Lead and Copper</b>			
5.1 – Submit primacy revisions as necessary  <a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a>	Indiana adopted the following rules:  LCR: 12/5/1994. LCRMR: 1/1/01  Primacy application for LCRSTR was submitted to EPA R5 in May 2011. IDEM responded to EPA comments in January 2012. Rule revisions will occur sometime mid-2014.	Indiana was awarded primacy for the following rules:  LCR: 3/16/1995. LCRMR: 12/1/05  Region 5 will provide training, as needed.	Requested rule revisions are being made with the RTCR rulemaking.  No rule revisions were submitted to R5 EPA for review in SFY 14 or 15.  Once IDEM Rules staff determine how to proceed with final RTCR, the requested changes will be included with that rulemaking.
5.2 – Incorporate rule revisions into state oversight and enforcement operations.	LCRMR has been incorporated in IDEM’s compliance and enforcement tracking mechanisms.		Complete.  R5 EPA was unable to verify this activity.
5.3 – Notify all CWSs and NTNCWSs of their LCRSTR regulatory requirements	All public water systems are notified of their regulatory requirements.		Meeting commitment.  R5 EPA was unable to verify this activity.
5.4 – Maintain a data base management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs.	LCR and the minor revisions are tracked using SDWIS.		LCR and LCRMR are tracked under the CDS module of SDWIS.  R5 EPA confirms that IDEM uses SDWIS CDS to track LCR and LCRMR.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Lead and Copper</b>			
5.5 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90 <sup>th</sup> percentile action level sample data for all large and medium sized systems, and 90 <sup>th</sup> percentile action level exceedance sample data for small systems.	All violations, enforcement, and inventory updates are reported to SDWIS quarterly.	<p>R5 will evaluate the extent to which LCRSTR violations are reported to SDWIS/FED.</p> <p>R5 expects to finalize the LCR module of the NPDWR compliance determination and violation/enforcement reporting tool (CDVRT) by December 31, 2013.</p>	<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA confirms that IDEM met all of its electronic reporting commitments.</p> <p>As of January 2016, R5 EPA was finalizing the LCR module of the NPDWR compliance determination and violation reporting tool. We are projecting the LCR module to go live some time in February.</p> <p>According to the October 2015 data freeze, IDEM reported 72 LCR M/R violations between 7/1/14 and 6/30/15.</p>
5.6 – Designate OCCT and follow-up on OCCT installation violations at all required PWSs.	OCCT continues to be issued for PWSs. OCCT installation violations will be referred for formal enforcement. Schools and day care M/R violations are readily identified in the Agency database system. Monthly, quarterly, or semi-annual M/R update queries are made to identify M/R violations. Once M/R violations are identified, violation letters are sent.		<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA was unable to verify this activity.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Lead and Copper</b>			
5.7 – Follow-up on all M/R violations.	M/R violations are readily identified in the Agency database system. Monthly, quarterly, or semi-annual M/R update queries are made to identify M/R violations. Once M/R violations are identified violation letters are sent.	Region 5 will assist as necessary, or as requested.	<p>Ongoing activity, meeting commitment.</p> <p>Violations made for this rule can be viewed at IDEM DWW website. Also, if there is any violation of this type, it is reported to SDWIS/FED on a quarterly basis. If violation is resolved, return to compliance code, SOX, is also made available at IDEM's DWW website.</p> <p>R5 EPA was unable to verify this activity.</p>
5.8 – Set optimal water quality parameter ranges and/or minimum values for all CWSs and NTNCWSs where required by the LCR.	WQP ranges continue to be set for all PWSs that are required to optimize corrosion control.		<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA was unable to verify this activity.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
<p>6.1 – Submit primacy revisions as necessary.</p> <p><a href="#"><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></a></p>	<p>Indiana adopted the following DDBPR Rules:</p> <p>Stage 1 DDBPR: 12/1/02. Revised Stage 2 DDBPR: 3/27/13</p> <p>Minor modification to the DDBPR will be adopted sometime mid-2014.</p>	<p>Region 5 awarded primacy for the Stage 1 DDBPR on 4/8/13.</p> <p>Review and approve Stage 2 DDBPR primacy application.</p> <p>Train state staff about Stage 2 D/DBPR by offering in-state and/or regional training opportunities.</p>	<p>Additional minor modifications being done with RTCR rulemaking.</p> <p>During the performance period, R5 EPA responded to Stage 2 DDBPR Rule development and implementation questions.</p> <p>Once IDEM Rules staff determine how to proceed with final RTCR, the requested changes will be included with that rulemaking.</p>
6.2 – Notify all CWSs and NTNCWSs (serving greater than 10,000 people) delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their Stage 2 regulatory requirements.	<p>All systems have been informed of their regulatory requirements.</p> <p>DWB Staff completed training for Stage2 DBP rules in mid-2008.</p>	<p>Region 5 will handle and close out all enforcement actions that we’ve initiated and will continue to take enforcement actions until at least the point of state rule adoption. Once the state has adopted the rule, Region 5 will be available to assist with any enforcement actions needed.</p>	<p>Trainings were done for all system sizes prior to the Stage 2 compliance monitoring start date for each Stage 2 schedule.</p> <p>R5 EPA was unable to verify this activity.</p>
6.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the D/DBP rule.	<p>Stage 1 and 2 D/DBP rules compliance are tracked using SDWIS. The new D/DBP rule is tracked under the CDS module of SDWIS. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.</p>		<p>The new D/DBP rule is tracked under the CDS module of SDWIS. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.</p> <p>R5 EPA confirms that Stage 2 is being tracked in SDWIS CDS. IDEM has never reported any Stage 1 violations.</p>



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
6.4 – Electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/FED for all public water systems, including operator certification treatment technique violations per 141.130(c).	All violations, enforcement and inventory updates are reported to SDWIS quarterly.	R5 will evaluate the extent to which Stage 2 violations and 141.130(c) operator certification treatment technique violations are reported to SDWIS/FED.	<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA confirms that IDEM met all of its electronic reporting commitments.</p> <p>R5 EPAs October 2015 data freeze found that IDEM had reported 49 Stage 2 MCL violations and 281 Stage 2 MR violations (note: IDEM has never reported any Stage 1 violations).</p> <p>R5 EPAs October 2015 data query found that IDEM did not submit any operator certification violations.</p>
6.5 – Follow-up on: (a) all MCL/MRDL violations, including chlorine dioxide MRDL violations; (b) all M/R violations; (c) all other reporting requirement violations.	When compliance staff identifies MRDL violations including chlorine dioxide MRDL violations, a violation letter will be issued to the system and the Field staff will be informed. Field staff will follow-up as necessary to help facilitate compliance.	Region 5 will assist as necessary, or as requested.	<p>Ongoing activity, meeting commitment.</p> <p>Violations made for this rule can be viewed at IDEM DWW website. Also, if there is any violation of this type, it is reported to SDWIS/FED on a quarterly basis. If violation is resolved, return to compliance code, SOX, is also made available at IDEM's DWW website.</p> <p>R5 EPA was unable to verify this activity. No assistance was requested.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>6.0 – D/DBPRs</b>			
6.6 – Ensure that Subpart H systems using conventional filtration operate in compliance with the DBP precursor control treatment technique requirements.	A database for DBP precursor removal is maintained that accurately tracks the inventory (including routine updates of system information) and violations of the DBP precursor removal requirements.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  R5 EPA was unable to verify this activity. No assistance was requested.
6.7 – Determine which systems do not qualify for reduced monitoring and inform them they must return to the routine monitoring frequency.	Determinations will be made and the systems will be informed.		Ongoing activity, meeting commitment.  R5 EPA was unable to verify this activity.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>7.0 – IOCs (including Arsenic)</b>			
<p>7.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the IOCs.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>Indiana Phase 2/5 rules were adopted on 12/5/1994.</p> <p>IOC compliance is tracked using SDWIS CDS module.</p>	<p>Primacy for the Indiana Phase 2/5 Rules was awarded on 3/16/1995.</p>	<p>IOCs are tracked under the CDS module of SDWIS.</p> <p>R5 EPA confirms that IDEM tracks IOCs with SDWIS CDS.</p>
<p>7.2 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.</p>	<p>All violations, enforcement and inventory updates are reported to SDWIS quarterly.</p>		<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA confirms that IDEM met all of its electronic reporting commitments.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>7.0 – IOCs (including Arsenic)</b>			
7.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.	All M/R violations are issued violation letter after the end of the reporting period. After an MCL violation, a letter is sent to the PWS in violation. Field Inspectors are given copies of the letters and a follow-up is made either by phone or on-site inspection. An immediate determination is made as to the adequacy of the system's action. If necessary, the system is directed to take additional steps to protect public health. Further contact is made by Compliance staff to ensure field follow-up has been made and that actions and samples have been recorded in SDWIS.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  Violations made for this rule can be viewed at IDEM DWW website. Also, if there is any violation of this type, it is reported to SDWIS/FED on a quarterly basis. If violation is resolved, return to compliance code, SOX, is also made available at IDEM's DWW website.  R5 EPA was unable to verify this activity. No assistance was requested.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>8.0 – Radionuclides (including Radon)</b>			
8.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for radionuclides.  <a href="#">Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</a>	Indiana adopted Radionuclides Rules on 1/12/05.  Radionuclide rule compliance is tracked using the SDWIS module.	Indiana was awarded primacy for Radionuclides on 7/23/07.	Radionuclides are tracked under the CDS module of SDWIS.  R5 EPA confirms that radionuclides are tracked with the SDWIS CDS module.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>8.0 – Radionuclides (including Radon)</b>			
8.2 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs.	All violations, enforcement and inventory updates are reported to SDWIS quarterly.		Ongoing activity, meeting commitment.  R5 EPA confirms that IDEM met all of its electronic reporting commitments.
8.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.	Process similar to 7.3 above.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment. For FY14 and 15, no violation has been issued for this type of violation.  R5 EPA was unable to verify this activity. No assistance was requested.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>9.0 – SOC's</b>			
9.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the SOC's.  <a href="#">Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</a>	Indiana Phase 2/5 rules were adopted on 12/5/1994.  SOC compliance is tracked using SDWIS.	Primacy for the Indiana Phase 2/5 Rules was awarded on 3/16/1995.	SOC's are tracked under the CDS module of SDWIS.  R5 EPA confirms that IDEM tracks SOC's with SDWIS CDS.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>9.0 – SOC</b>			
9.2 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	All violations, enforcement and inventory updates are reported to SDWIS quarterly and tracked under the CDS module. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.	<p>Monitor State SOC related follow-up to the findings of the last data and enforcement verification report, which were:</p> <ol style="list-style-type: none"> <li>1. Ensure that IDEM assigns violations when systems <math>\geq 3300</math> fail to collect 2 samples in a 12-month period following a 3 year compliance period.</li> <li>2. Ensure that IDEM assign M/R violations for missed chemical sampling (either routine or increased).</li> <li>3. Ensure that systems monitor for fluoride even if they do not fluoridate.</li> <li>4. Ensure that violations are assigned for quarterly sampling following an SOC greater than the detection limit.</li> </ol>	<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA confirms that for 2014, IDEM met its all of its electronic reporting commitments.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>9.0 – SOC</b>			
9.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.	Process similar to 7.3 above.	Region 5 will assist as necessary, or as requested.	<p>Ongoing activity, meeting commitment.</p> <p>Violations made for this rule can be viewed at IDEM DWW website. Also, if there is any violation of this type, it is reported to SDWIS/FED on a quarterly basis. If violation is resolved, return to compliance code, SOX, is also made available at IDEM's DWW website.</p> <p>R5 EPA was unable to verify this activity. No assistance was requested.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>10.0 – VOCs</b>			
<p>10.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system info), and violations for VOCs.</p> <p><a href="#"><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></a></p>	VOC compliance is tracked using SDWIS. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.		<p>VOCs are tracked under the CDS module of SDWIS.</p> <p>R5 EPA confirms that IDEM tracks VOCs with SDWIS CDS.</p>
10.2 – Electronically report all VOC MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	All violations, enforcement and inventory updates are reported to SDWIS quarterly.		<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA confirms that IDEM met all of its electronic reporting commitments.</p>
10.3 – Follow-up on MCL and M/R violations and take an appropriate course of action that ensures public health protection.	Process similar to 7.3 above.	Region 5 will assist as necessary, or as requested.	<p>Ongoing activity, meeting commitment.</p> <p>Violations made for this rule can be viewed at IDEM DWW website. Also, if there is any violation of this type, it is reported to SDWIS/FED on a quarterly basis. If violation is resolved, return to compliance code, SOX, is also made available at IDEM’s DWW website.</p> <p>R5 EPA was unable to verify this activity. No assistance was requested.</p>



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>11.0 – Organic and Inorganic Chemical Monitoring Waiver Program</b>			
<p>11.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval.</p> <p><a href="#"><i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i></a></p>	No changes to the approved waiver program have been made to date.		<p>No changes made.</p> <p>Cyanide waivers were rescinded at the request of Region 5 EPA. No other changes were made to the waiver program.</p> <p>Region 5 EPA confirms that IDEM rescinded cyanide waivers.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>12.0 – Sodium</b>			
12.1 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for sodium M/Rs.  <a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a>	The database for compliance tracking and determination for sodium is part of the IOC database using the CDS module of SDWIS. To ensure accuracy of treatment and distribution information currently contained in SDWIS, data from sanitary surveys is checked against SDWIS and updated as necessary.		Sodium rule is tracked under the CDS module of SDWIS.  R5 EPA confirms that IDEM tracks the Sodium rule with SDWIS CDS.
12.2 – Notify appropriate local and State health departments of the sodium levels in CWS drinking water.	All county health departments are provided sodium levels of CWS upon request.		Ongoing activity, meeting commitment.  For FY14 and 15, no PWS has violated this rule.  R5 EPA was unable to verify this activity.
12.3 – Follow-up on M/R violations.	All PWSs with M/R violations are issued a violation letter. The sodium database is part of the CWS IOC database and is tracked as part of that group.	Region 5 will assist as necessary, or as requested.	Ongoing activity, meeting commitment.  For FY14 and 15, no PWS has violated this rule.  R5 EPA was unable to verify this activity. No assistance was requested.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>13.0 – Public Notification</b>			
13.1 – Notify all public water systems of their public notification requirements.  <a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a>	Indiana adopted the PN rule on 8/1/01.  All PWSs have been notified of regulatory requirements.	Indiana was awarded primacy for the PN rule on 12/1/05.	Completed.  Confirmed by R5 EPA.
13.2 – Maintain a data base management system that accurately tracks PN violations.	The PN violations are tracked under the TCR, CDS, and CCR modules of SDWIS.		PN rule is tracked under the TCR, CDS and CCR modules of SDWIS.  R5 EPA Confirms that IDEM tracks the PN rule through the TCR CDS and CCR modules of SDWIS.
13.3 – Electronically report all public notification violations to SDWIS/FED.	All violations, enforcement, and inventory updates are reported to SDWIS quarterly.		Ongoing activity meeting commitment.  R5 EPA confirms that IDEM met all of its electronic reporting commitments.
13.4 – Follow-up on all Tier 1 violations.	When a system fails to issue a PN under a Tier 1 violation, it is reported as a violation in SDWIS. Both compliance and field staff follow-up on all Tier 1 violations.	Region 5 will assist as necessary, or as requested.	Ongoing activity meeting commitment.  All Tier 1 violation for CWS is tracked during the CCR submittal and if not reported, CCR notice is required to be redone.  R5 EPA was unable to verify this activity. No assistance requested.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>13.0 – Public Notification</b>			
13.5 – Follow-up on all Tier 2 and Tier 3 violations.	When a system fails to issue a PN under a Tier 2 or Tier 3 violation, it is reported as a violation in SDWIS. CWSs can report violations as part of their CCR. No additional follow-up will typically be made due to resource limitations.	Region 5 will assist as necessary, or as requested.  R5 to track progress related to state and EPA efforts to obtain additional resources necessary to enable Indiana to follow up on all Tier 2 and Tier 3 violations.	Ongoing activity, meeting commitment.  Tier 2 and 3 violations for CWS are tracked during the CCR submittal and if not reported, CCR notice is required to be redone.  R5 EPA was unable to verify this activity. No assistance requested. R5 EPA confirms that neither state nor federal resources were available to support this activity.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>14.0 – CCR</b>			
14.1 – Notify all regulated water systems of their CCR requirements.  <a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a>	Indiana adopted the CCR rule on 12/1/1999.  All PWS have been notified of regulatory requirements.	Indiana was awarded primacy for the CCR rule on 10/1/01.  Region 5 will monitor electronic delivery according to a memo dated January 3, 2013, which documents delivery options: <a href="http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/ccrdeliveryoptionsmemo.pdf">http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/ccrdeliveryoptionsmemo.pdf</a>	Complete.  R5 EPA confirms that IDEM has updated their fact sheet on CCR requirements and it links to the EPA website where the new e-delivery options are described.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>14.0 – CCR</b>			
14.2 – Maintain a data base management system that accurately tracks CCR violations.	A database for CCR is maintained that accurately tracks all CCR violations. CCR is also tracked under the SDWIS compliance schedule module.		CCR is tracked under SDWIS compliance schedule module.  R5 EPA confirms that IDEM accurately tracked CCR violations in SDWIS during SFY 14 and 15.
14.3 – Electronically report all CCR violations to SDWIS/FED.	All violations, enforcement, and inventory updates are reported to SDWIS quarterly.		Ongoing activity, meeting commitment.  R5 EPA confirms that IDEM met all of its electronic reporting commitments.
14.4 – Enforce the rule when the water system has not issued a CCR or issued one with insufficient content.	Systems that meet the ERP violation for CCR will be referred to the Enforcement Section for formal enforcement action. If the CCR is not issued as well as the Certification letter, they are identified by the compliance database during July and October of each year respectively. The systems are tracked using SDWIS and issued violation letters.	Region 5 will assist as necessary, or as requested.  EPA will monitor development of options for CCR delivery.	Ongoing activity, meeting commitment.  R5 EPA verified that IDEM has updated their fact sheet on CCR requirements and it links to the USEPA website where the new e-delivery options are described. No R5 assistance was requested during FY 14 or 15.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>15.0 – Laboratory Certification</b>			
<p>15.1 – All laboratories that produce results for compliance with SDWA in Indiana are certified by Indiana at a frequency of at least once every three years and meet all requirements of 40 C.F.R. parts 141 and 142. Certifications will be conducted according to the <u>EPA Manual for the Certification of Laboratories Analyzing Drinking Water</u>, Fifth Edition. Third parties may be used to conduct the on-site inspections of the laboratories, but the certifications must be issued by an appropriate State official.</p> <p>It is recommended that Indiana have a process for ensuring capacity to analyze at the Principal State Laboratory or commercial labs all NPDWR parameters that are required to be sampled in the State</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>IDEM is under a Memorandum of Agreement with the Indiana State Department of Health (ISDH) to issue the Laboratory certification Program for all laboratories performing analyses for compliance with SDWA. ISDH is performing the procedures established in accordance with the Lab Certification guidance manual.</p>	<p>Region 5 EPA last audited the Indiana laboratory certification program in May 2013.</p> <p>EPA will monitor progress toward addressing comments and findings from the lab certification audit.</p>	<p>Ongoing activity, meeting commitment.</p> <p>R5 EPA has no concerns with the Indiana Laboratory Certification program at this time.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>15.0 – Laboratory Certification</b>			
<p>15.2 – Maintain primacy by complying with 40 CFR 142.10, which includes:</p> <p>142.10(b)(3)(i) – maintenance of a program to certify laboratories, managed by a State-designated laboratory officer or officers.</p> <p>142.10(b)(4) – assure availability of State-certified laboratory facilities to perform analysis of regulated drinking water contaminants.</p>	<p>The Lab Certification process established by ISDH ensures all NPDWR parameters can be analyzed by the State Lab (ISDH) and/or commercial labs.</p>		<p>Meeting commitment performed by ISDH.</p> <p>R5 EPA confirms that Indiana is maintaining a laboratory certification program that meets Agency criteria.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
<p>16.1 – Participate with R5 in compliance and enforcement planning actions including referrals, Enforcement Verification audits, and state compliance and enforcement strategy updates.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>IDEM’s compliance and enforcement strategy was last updated several years ago. However, the strategy referenced EPA guidance manual as well as IDEM’s DWB SOPs as part of the strategy. Currently we have almost 28 SOPs in place. We will provide copies of the SOPs once they are made available to IDEM’s website.</p> <p>IDEM’s compliance strategy is current. It is routinely updated to reflect any rule change or policy and/or implementation strategy. IDEM will attend R5 meetings as resources and management priorities allow. If not able to attend in person, IDEM will participate via phone.</p>	<p>EPA Region 5 conducted its last enforcement verification visit in November 2008. The final EV report was dated August 24, 2012.</p> <p>Conduct meetings and conference calls to review status as necessary.</p>	<p>Activities consistent with commitment.</p> <p>R5 EPA did not conduct an enforcement verification audit of IDEM in 2014 or 2015. Status meetings and conference calls were periodically held.</p>
16.2 – Conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities and to address or resolve ERP priority systems within six months after being identified as priorities.	IDEM will conduct compliance assistance and enforcement according to the process outlined in the State compliance and enforcement strategy.	Assist with enforcement referrals, enhanced data exchange, analysis, data clean up, or other joint efforts as requested by state.	<p>Ongoing activity, meeting commitment.</p> <p>During 2014 and 2015, IDEM consistently met R5 EPA deadlines to provide data on priority systems and referral requests with each quarterly ERP letter.</p>
16.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and	This is an on-going State commitment in order to achieve the best compliance rate for Indiana. DWB has a Capacity Development Team that assist in achieving	Assist with enforcement referrals, analysis, data clean up, or other joint efforts as requested by state.	<p>Ongoing activity, meeting commitment.</p> <p>IDEM consistently met R5 deadlines to provide data on</p>



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.	compliance for recalcitrant systems.		priority systems and referral requests with each quarterly ERP letter.
16.4 – Update compliance and enforcement activities as directed in the quarterly ERP letter.	IDEM will update R5 on compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.	Each quarter, R5 will send the states updated ERP reports requesting a state update. R5 will integrate State updates into reports before the next request is sent out.	Ongoing activity, meeting commitment.  IDEM consistently met R5 deadlines to provide data on priority systems and referral requests with each quarterly ERP letter.
16.5 – Electronically report state formal enforcement actions, return to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link to all appropriate violations helps ensure an accurate ERP list.	The State will update SDWIS/FED with this information quarterly, and link ERP addressing enforcement actions, and/or SOX dates to violations as appropriate such that SDWIS/FED accurately represents those actions for each violation affected.		Ongoing activity, meeting commitment.  R5 EPA confirms that IDEM met all of its electronic reporting commitments, and addressed all data issues that showed up in the quarterly ETT, as needed.
16.6 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Address and resolve a specific number of systems between July 2013 and June 2014 for FY 14 and between	IDEM commits to address and resolve the specified number of systems within the applicable time frame.	R5 will track state commitments under measure SDWA02 and update state quarterly, engaging in discussion with states on progress as needed.	Meeting commitment.  For FY 2014: IDEM's Commitment was 37 systems. End of year results in the July 2014 ETT show that IDEM addressed or returned to compliance 70 systems in FY 2014

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
July 2014 and June 2015 for FY15.			<p>(29 from the original 37 on the July 2013 fixed base list plus an additional 41 that had become priority systems after July 2013).</p> <p>For FY 2015: IDEMs Commitment was 34 systems. End of year results in the July 2015 ETT show that IDEM addressed or returned to compliance 58 systems in FY 2015.</p> <p>For FY 2016: IDEMs Commitment is 42 systems.</p> <p>R5 commends IDEM for exceeding its compliance and enforcement management commitment.</p>

e 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>17.0 – Data Management and Reporting</b>			
<p>17.1 – IDEM must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. IDEM must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, IDEM should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the "Ctrl" key while clicking the left mouse button).</a></p>	<p>For each data submission with errors IDEM will contact the Region about their plans for fixing them.</p> <p>IDEM-DWB has created and tested the modernized test database and is in production mode since 2005.</p> <p>This is an ongoing process for IDEM-DWB staff since IDEM is fully utilizing all applicable modules of SDWIS.</p> <p>IDEM will continue to provide error free XML submittals</p>	<p>Provide technical assistance and program assistance to all Region 5 States related to data management.</p>	<p>IDEM has upgraded the SDWIS/FedRep to v3.4. See State commitment.</p> <p>R5 EPA Confirms that IDEM is using Fed Rep 3.4, which is the latest version available.</p> <p>R5 EPA also commends IDEM for submitting reports that are nearly error free, and for working with EPA quickly and efficiently to correct errors, if any are found.</p> <p>R5 EPA was available during the performance period to assist with correcting ODS data entry, if necessary.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
17.2 – Continue to improve inventory reporting to SDWIS/FED focusing primarily on inventory data quality errors and improving locational data for CWS intakes, wells, and treatment plants for increased emphasis on Regional emergency response needs.	<p>This is an ongoing process for IDEM-DWB staff since IDEM is fully utilizing all applicable modules of SDWIS.</p> <p>IDEM will continue collecting treatment plant information thru sanitary survey information and source water lat/long data. Reporting to SDWIS/ODS database will be on-going for the information. Locational data for intakes, wells, treatment plants, and other major system components collected by DWB Field Inspection and Ground Water Sections will be entered into SDWIS.</p>	Region 5 will share the revised inventory reporting guidance document with IDEM when it becomes available from EPA HQ.	<p>Meeting commitment.</p> <p>R5 EPA did not release the inventory reporting guidance document in 2015. EPA HQ staffing reductions may result in future delays in production and release.</p>
<p>17.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan):</p> <p>17.3a – IDEM will commit to full automation including electronic reporting from labs and automated monitoring schedule generation and system notification.</p> <p>17.3b – IDEM will automate the compliance determinations for all rules for which it has primacy.</p> <p>17.3c – IDEM will update standard operating procedures, as necessary,</p>	<p>Since data management is critical to each State's ability to maintain primacy, the State will send a representative to the annual ASDWA Data Management Users conference.</p> <p>IDEM utilizes the Lab to State module. However, to assists most Certified Labs and PWS in full automation of electronic reporting, SAIC is developing electronic sampling entry (eSE) for IDEM allowing Cert. Lab to submit single or batch data onto SDWIS/State with QA/QC capability, thus saving IDEM of doing data entry of Lab</p>	<p>Region 5 will evaluate the extent to which TCR and nitrate violations are reported late to SDWIS/FED.</p> <p>Region 5 will finalize the NPDWR CDVRT during FY 14.</p> <p>Region 5 will assist IDEM with resolving data quality issues, as appropriate and as resources allow.</p>	<p>Meeting commitment. State SDWIS upgrade to v3.2 was completed in August 2013. IDEM intend to upgrade SDWIS to v3.3 by April 1, 2016.</p> <p>IDEMs eSE-Verify under CROMERR became effective last October 31, 2014. Training with the certified labs for using the eSE began in July and August 2015.</p> <p>IDEM eSE application was placed in production October 1, 2015 and currently several Certified Laboratories are submitting compliance data thru the eSE.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>16.0 – Compliance and Enforcement Management</b>			
<p>to ensure proper compliance determinations are being made.</p> <p>17.3d – IDEM will provide timely compliance determination training to staff, particularly for new rules.</p> <p>17.3e – IDEM will ensure the accuracy of the service area reporting for school and daycare PWSs and make revisions as necessary.</p>	<p>results.</p> <p>SDWIS is supposed to automate compliance determinations for all rules. However, if SDWIS cannot automate compliance, IDEM will develop add-on application to achieve automation.</p> <p>SOPs are developed as needed when new procedures are put in place for proper compliance determination. So far, 28 SOPs have been developed.</p> <p>IDEM routinely attends webinars being provided for training staff on current and specifically new rules. In addition, in-house training and mentoring is made by senior staff to new staff.</p> <p>IDEM will copy Region 5 when responding to the annual headquarters survey asking about information on SDWIS. In addition, staff continues to maintain (on a daily basis) updates or revisions to all elements of the inventory modules (especially for schools and daycare) for proper accuracy.</p>		<p>SOPs are continued to be made and previous SOPs are updated when necessary.</p> <p>All other commitments are met.</p> <p>R5 EPA confirms that IDEM met all of its electronic reporting commitments.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>18.0 – Annual Compliance Report</b>			
<p>18.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>IDEM will submit ACRs for the following fiscal years by the corresponding due dates:</p> <p>For Calendar Year 13: 7/1/14 For Calendar Year 14: 7/1/15</p>	<p>OECA to provide annual ACR guidance. R5 will forward guidance when received.</p>	<p>Completed for 2015.</p> <p>R5 EPA forwarded ACR guidance and IDEM submitted the Indiana Calendar Year 2013 Annual Compliance Report on June 30, 2014 and the Calendar Year 2014 Annual Compliance Report on June 30, 2015.</p>

Table 1. Primacy Activities

Table 1. Primacy Activities				
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation	
19.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals				
19.1 – Gather information to track strategic plan progress.  The IDEM-DWB director will attend the annual Region 5 state directors meeting in April of each fiscal year to discuss primacy and implementation issues.  <a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a>	IDEM will report on status of its commitments for measures in U.S. EPA’s strategic plan.	Compile information and report to HQ.  Annually assess each State’s progress in attaining the shared goals milestones, and identify U.S. EPA or State follow-up actions needed to maintain or improve compliance. Negotiate appropriate disinvestments with States as necessary to ensure that the highest priority work is done. Work with State Drinking Water and Ground Water Programs to increase public understanding of the impacts of budget cuts on public health protection efforts, and assist in state efforts to gain additional program resources.  R5 will schedule semi-annual conference calls about every six months to discuss status updates and issues regarding state-specific topics, as necessary.	Goal+ Milestone 1: ≥95.0% Milestone 2: ≥95.0% Milestone 3: <5.0% Milestone 4: <10.0% Milestone 5: <5.0% Milestone 6: <10.0% Milestone 7: <10.0% + by 2016  DWB has participated and provided input and commitments on the Strategic Plans and Shared Goals with Region 5 States.  For Calendar Year 2014 (April 2015 data freeze), Indiana met or exceeded these milestones:  5: NTNCWS with sig acute viols 6: MR violations for chronic viols  Indiana did not meet the following milestones:  1: NTNCWS meet standards 2: TNCWS meet standards 3: Pop have significant MR viols 4: CWS with major viols 7: TNCWS have sig MR viols	EOY 94.4% 92.6% 22.9% 11.6% 4.0% 2.7% 17.8%

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Preparing for Security Threats at PWSs</b>			
<p>1.1 – The state has adopted and can implement an adequate plan for the provision of safe drinking water under emergency circumstances including, but not limited to, earthquakes, floods, hurricanes, and other natural disasters.</p>	<p>State has developed a template, available to all systems, for Emergency response for provision of water during emergencies. System plans will be reviewed during sanitary surveys.</p>	<p>Review state emergency water plans and consult with the state on implementation capabilities.</p>	<p>Emergency response plans are reviewed for CWSs during sanitary surveys. In October 2015 IDEM participated in a HQ funded statewide tabletop exercise in Ft. Wayne, IDEM also participated in tabletop exercises for all Indiana American Systems and Citizen's Water (Indianapolis). InWARN now has 133 member systems. IDEM security coordinator is an assist at the emergency operation center at ESF3 seat.</p> <p>During 2014, Indiana Department of Homeland Security re-organized. INWARN had about 117 members; INWARN chair participated in the HQ funded IDEM TTX held on January 29, 2014.</p> <p>IDEMs DW state director has agreed in principle to either send EPA utility status internal reports during disasters, or to have another agency provide/make available utility status information. R5 EPA verified this at the annual state DW directors meeting on April 29, 2014.</p>



Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Operator Certification</b>			
<p>2.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of the Operator Certification Program to avoid 20% withholding of the DWSRF capitalization grant by the end of the fiscal year (September 30).</p> <p><a href="#"><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></a></p>	IDEM will submit the requested documentation by the specified due date.	<p>IDEM received primacy approval for its operator certification rules on 9/1/01.</p> <p>Coordinate information and issues on Op Cert Program implementation and review and approve annual reports.</p>	<p>Report submitted within the required time frame.</p> <p>R5 EPA confirms that IDEM submitted its annual report on time.</p> <p>R5 commends IDEM for maintaining a consistent number of certified operators. IDEM has achieved excellent compliance rates that show that nearly all water systems in the State have certified operators.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Operator Certification</b>			
<p>2.2 – For operators of CWSs and NTNCWSs: (1) provide training and certification opportunities for new operators, and (2) provide training and opportunities for upgrading and renewing certification for existing operators.</p>	<p>IDEM staff will work to discover and receive acknowledgement by systems of certified operator vacancies, and follow up with systems to locate and secure viable candidates. IDEM will continue to ensure that certified operators demonstrate technical knowledge and pass the certification examination required by the Commissioner.</p>		<p>IDEM continues to provide on line training tools for operators. We are developing additional web accessible tools for the RTCR to provide ready tools for operators. Training continued targeting areas identified by certification exams to be areas of need for operators.</p> <p>A list of online training tools and list of study materials are available on IDEM's web site. In addition, staff participates in presenting training classes independently and in conjunction with professional associations. Extra care and efforts have been made in the past year to assist operators by providing training specifically in areas shown to be deficient based on certification tests.</p> <p>IDEM has continued to maintain excellent compliance rates that show most Community water systems (98.9%), most Non-Transient Noncommunity water systems (99.3%), and all applicable Transient Noncommunity systems (100%) have certified operators.</p> <p>R5 EPA commends IDEM for seeking innovative approaches to make training and testing available to prospective professionals.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Operator Certification</b>			
<p>2.3 – Provide supplemental certification and training to water system operators on relevant “Sustainable Water Infrastructure” topics from section 1.0 of the “EPA national and regional priorities” table of the ARDP to ensure sustainable water utilities and water supplies. For example, conduct CEU-eligible training to water operators on supply/demand water efficiency or add supplemental questions on treatment plant energy efficiency activities to certification exams.</p>	<p>IDEM does not currently offer training on Sustainable Water Infrastructure or supply/demand water efficiency. There are currently insufficient resources to conduct these activities. IDEM will consider adding questions to the certification exams with regard to treatment plant energy efficiency.</p>	<p>Region 5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with states.</p>	<p>The new exam and process will be in effect early in 2016. Question set has been developed with the help of the stakeholder workgroup. Contract with Ivy Tech Community College to administer the exam at their 25 test centers around the state is in the signature process. We expect it to be finalized mid January. Drought and resiliency questions included in exam question base.</p> <p>IDEM is in the process of developing our own exam. We will consider the addition of questions specific to “Sustainable Water Infrastructure” and energy efficiency in the new tests. Staff has also participated in training for certified well drillers in conjunction with Indiana Department of Natural Resources. Training topics have included supply, demand, ground water protection, sustainability, and water resources.</p> <p>R5 EPA commends IDEM for considering “green practices” in its training and tests. We look forward to future progress updates.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Capacity Development</b>			
<p>3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures by the end of the calendar year (December 31).</p> <p><a href="#"><i>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</i></a></p>	IDEM will submit the requested documentation by December 31.	Region 5 will send a reminder to the State concerning the capacity development annual report due date in November.	<p>Report submitted within the specified time frame.</p> <p>R5 EPA confirms that the IDEM report was submitted on time.</p>
3.2 – Submit a report to the governor and provide a copy U.S. EPA on the efficiency of the strategy and the progress made toward improving the capacity of water systems in Indiana by October 1.	IDEM will submit the report to the governor, with a copy to Region 5 by October 1.	Region 5 will remind IDEM about the report to the governor in August.	<p>Report to the Governor not due in 2015. Annual report to EPA submitted within the required time frame.</p> <p>R5 EPA confirms that the IDEM report was submitted on time.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>3.0 – Capacity Development</b>			
<p>3.3 – Promote “Sustainable Water Infrastructure” activities as described in section 1.0 of the “national and regional EPA priorities” table of the ARDP in Capacity Development activities and assessments as part of improving the capacity and sustainability of water systems and water supplies. For example, provide technical assistance on starting an asset management program or conduct energy audits for treatment plants.</p>	<p>During trainings, IDEM always promotes a good asset management program. IDEM does not conduct energy audits for treatment plants at this time. Maintaining records of equipment and supplies as well as infrastructure updates is always promoted.</p>	<p>Region 5 SWI workgroup will provide training and outreach materials and assistance on tools (i.e., Check Up Program for Small Systems (CUPSS)) to water system operators and technical assistance providers, in coordination with states.</p>	<p>In 2015 we partnered with the North Carolina Finance Center to provide training and support to Indiana systems in financial matters and sustainability. IDEM continues to include asset management during presentation and quarterly meetings with the Indiana Regulatory Commission and the Office of the Utility Consumer Counselor to discuss at risk systems and work together to address issues.</p> <p>Asset management is promoted during sanitary surveys and presentations. In addition, staff regularly meets with the Indiana Regulatory Commission and the Office of the Utility Consumer Counselor to discuss at risk systems and to work together to ensure that rate requests take into account needs identified by IDEM inspections. Drinking water staff also contributes columns to professional association publications covering numerous subjects including asset management.</p> <p>R5 EPA acknowledges and congratulates IDEM for its efforts to promote good asset management.</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
<p>4.1 – Update source water assessments, as resources allow.</p> <p><a href="#"><u>Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</u></a></p>	<p>IDEM staff will review previously prepared SWP plans as PWS’s come due for SOC/VOC waivers renewals, SWP plans will be amend/updated as necessary. Wellhead Plans at CWSs are required by rule to be updated by the PWS and IDEM will review the updates.</p>		<p>Ongoing activity, met commitments.</p> <p>R5 EPA was unable to verify IDEM SWP plan reviews performed as a part of SOC/VOC waiver renewals. IDEM is not required to report on CWS WHP update activity as per state rule.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
<p>4.2 – Assist local community source water protection (SWP) plan preparation and implementation in cooperation with Source Water Collaborative (SWC) members.</p>	<p>IDEM SWP plan development and implementation will be achieved with assistance from the following potential SWC partners:</p> <p>American Planning Association  American Water Works Assn.  Assn. of Clean Water Admin.  Assn. of Muni Water Agencies  Assn. of Territorial Health Ofcls.  ASDWA  Clean Water Fund  Environmental Finance Ctr. Ntwk  GWPC  Groundwater Foundation  Nat. Assn. of Conserv. Districts  Nat. Assn. of Counties  Nat. Environmental Service Ctr.  National Groundwater Assn.  NRWA  N. American Lake Mgmt Society  River Network  Rural Comm. Assist. Partnership  Smart Growth America  Trust for Public Land  USDA-FSA  USEPA  US Forest Service (USDA)  USGS  Water Systems Council</p>	<p>Continue to develop tools as needed, foster cross-program coordination, and encourage coordination with SWC partners to encourage broad-based actions at the state and local levels to address potential sources of contamination.</p> <p>Facilitate the development and expansion of State-SWC partnerships. Provide feedback and guidance.</p> <p>Encourage interstate communication through conference calls and an annual State–R5 EPA meeting.</p> <p>Encourage data sharing with other programs to prioritize permitting and compliance activities in sourcewater areas, for example.</p>	<p>IDEM has partnered with the Indiana Finance Authority (IFA) in the development of Source Water Emergency Response Plans (SWERP). The SWERPs are intended to provide Indiana’s public water systems, utilizing surface water as their source of drinking water, an additional tool in prevention of impacts to upstream water quality and procedures to follow in the event of emergency situations that could potentially impact water quality and drinking water resources. Ongoing activity, met commitments.</p> <p>R5 EPA encouraged interstate communication through quarterly conference calls with R5 states and through the R5 State SWP meeting which IDEM participated in.</p> <p>R5 EPA commends IDEM for exploring taking advantage of DWSRF SWP setaside funds to help develop emergency response plans for above ground storage tank facilities.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.3 – Report the number and names of CWSs with SWP plans and the number and names of CWSs implementing SWP measures (electronically via SDWIS, if possible) of substantial implementation as defined by the State as of June 30 in each of SFYs 14 and 15. Reports are due on August 15.	IDEM will report SWP progress electronically via SDWIS, which will include a downloadable list of water systems which qualify for inclusion on the list of systems which meet the State’s “substantial implementation” list.	Maintain and update State information in the Region 5 portion of the annual SWP report to EPA-HQ.  Monitor State performance versus predetermined targets SDW-4a and SDW-4b).	Reporting of the number of CWSs with SWP plans and the number of CWSs implementing SWP measures which met the State’s “substantial implementation” definition were done electronically via SDWIS, met commitment.  R5 EPA confirms that IDEM met all of its electronic reporting commitments.



Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
<p>4.4 – Develop and implement coordinated approaches with other regulatory and voluntary programs to protect both the quality and quantity of source water, particularly in areas of concern.</p>	<p>IDEM will work with other partners to protect source water. A few examples include our work with remediation programs to prioritize cleanups in source water areas and coordinating with the Center for Earth and Environmental Science at Indiana University-Purdue University Indianapolis, the Indiana State Department of Health and the Indiana Department of Natural Resources to provide information about blue-green algae in our waterways.</p>	<p>Provide training, technical assistance, and technology transfer capabilities.</p> <p>Facilitate the adoption and sharing of Geographic Information System databases to support local decision making.</p> <p>Work with Clean Water Act program to encourage assessment of surface waters for drinking water use, prioritize impaired waters, develop TMDLs, and develop tailored approaches to achieve substantial implementation.</p> <p>Review the Indiana 303(d) and 305(b) reports (or integrated reports) to recommend opportunities for source water protection.</p> <p>Enhance SWP integration elements like the watershed approach, stormwater management, and prioritized enforcement inspections based on SWP.</p> <p>Work with the state to characterize current and future pressures on source water quality and availability. Support voluntary programs such as WaterSense and other Sustainable Infrastructure activities to protect water resources.</p>	<p>Ongoing activity, met commitment. Highlight: IDEM is participating in an innovative long term collaboration between federal agencies, state Universities and a family farm in the Eagle Creek Watershed to better quantify the effects of agricultural practices on water (surface and ground water) quality and quantity using the first Edge-of-Field (EOF) sampling project. Ongoing activity, commitment met.</p> <p>R5 EPA recognizes IDEM for its creative approach and outreach with other agency partners to protect source water.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>4.0 – Source Water Assessments and Protection</b>			
4.5 – Develop and expand SWP program implementation mechanisms, where possible.	IDEM will work with communities to update wellhead protection plans and facilitate implementation of Phase II WHPP's. IDEM will promote source water protection partnerships with other SDWA and CWA program areas.	Promote the innovative use of DWSRF set-asides and other potential program funding streams.	Ongoing activity, met commitment.  R5 EPA recognizes IDEMs work to expand its SWP program to protect against possible spills from above ground storage tanks through the use of the DWSRF setaside.

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>5.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report</b>			
<p>5.1 – Review the draft report prepared by R5 and assist in filling gaps related to the State’s PWSS program to support the various components of the PWSS program implementation logic model.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>IDEM will participate with R5 in joint assessment of program progress, as resources allow.</p>	<p>Use the logic model to improve our ability to understand, measure, assess, and communicate progress.</p> <p>SPM will work with state program to determine state-specific approach, and schedule.</p>	<p>IDEM participated as requested.</p> <p>R5 EPA evaluated the IDEM program and measured progress through the midyear, end of year and joint assessment process under the EnPPA agreement.</p>

[Table 3. National and Regional EPA Priorities](#)

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>1.0 – Sustainable Infrastructure</b>			
<p>1.1 – Enable water system and water supply sustainability by providing incentives through DWSRF set-asides and grant criteria, providing training, and encouraging sustainable water infrastructure (SWI) activities including, for example, those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this work plan, including source water protection, DWSRF, operator certification, capacity development, and all-hazards resilience approaches, etc.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>The Indiana State Revolving Fund (SRF) Loan Program has a sustainability incentive for communities to include “green” project components in their SRF projects. Green projects include sustainable green infrastructure, water or energy efficiency measures or are environmentally innovative solutions. Based on the type and cost of the green component, a community may be eligible for improved ranking on the SRF Project Priority List as well as an interest rate break up to 0.5 % on its SRF Loan.</p>	<p>Region 5 staff participate in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense.</p> <p>Region 5 staff will participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives.</p> <p>R5 to contact states to identify what, if any, sustainable water infrastructure/climate change efforts are a priority.</p>	<p>In FY 2014-2015 SRF program provided n \$2,723,734 in GPR projects relating to savings for 13 separate communities.</p> <p>R5 EPA tracked climate change implementation at IDEM. We thank IDEM for providing valuable assistance to communities.</p>

Table 3. National and Regional EPA Priorities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
<b>2.0 – Environmental Justice</b>			
<p>2.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice.</p> <p><a href="#">Click here to go back to the table of contents (by pressing and holding the “Ctrl” key while clicking the left mouse button).</a></p>	<p>The Indiana Drinking Water State Revolving Fund (SRF) Loan Program gives priority to lower income and smaller population-served communities on its Drinking Water SRF Project Priority List. In addition, the Indiana Drinking Water SRF Loan Program provides additional subsidy, in the form of principle forgiveness, to eligible communities with high post-project user rates. The Indiana SRF Loan Program accepts public comment on its Intended Use Plans, Project Priority Lists, and environmental review documents. Current documents may be viewed at <a href="http://www.srf.in.gov">www.srf.in.gov</a>.</p>	<p>R5 has the capability to provide states with draft GIS maps that show areas with environmental justice concerns—currently through the Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT) and eventually through other tools as an interim screening approach.</p>	<p>In FY 2014-2015 the SRF program provided \$3,000,000 to the towns of Schneider and Gentryville.</p> <p>R5 EPA commends IDEM for providing valuable assistance to environmental justice communities.</p>

### **Attachment A: Linking the Strategic Plan to this Work Plan**

This continuing program grant is consistent with U.S. EPA's Strategic Plan Goal 2: Clean and Safe Water, which calls for protecting public health by providing safe drinking water. Many of the grant work plan activities contribute to the goal of assuring that people served by public water systems receive drinking water that meets all applicable standards through effective treatment and source water protection. Continuing program implementation includes adopting rules at least as stringent as federal regulations, providing assistance to public water systems on regulatory requirements, conducting sanitary surveys, ensuring that monitoring and follow-up is conducted, and enforcing regulations.

**Table A. Final FY 2013 National Water Program Guidance:  
OW and OECA National Program Manager (NPM) Guidance Targets and Program Activity Measures<sup>1</sup>**

<b>OW ACS code</b>	<b>Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink</b>
SDW-211	By FY2015, 92 percent of the population served by CWSs will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. State FY15 target: 92% <b>FY 15 Actual: 96.1%</b>
SDW-SP1.N11	By FY2015, 90 percent of the CWSs will meet all applicable health-based standards through approaches that include effective treatment and source water protection. State FY15 target: 90% FY 15 Actual: 91.9%
SDW-SP2	By FY2015, CWSs will provide drinking water that meets all applicable health-based drinking water standards during 95 percent of “person months” (i.e., all persons served by CWSs times 12 months). State FY15 target: 96% FY 14 Actual: 98.6%
SDW-SP4a	By FY2015, minimize risk to public health through source water protection for 50 percent of CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY15 target: 88% FY 15 Actual: 86.3%
SDW-SP4b	By FY2015, minimize risk to public health through source water protection for 57 percent of the population served by CWSs (i.e., “minimized risk” achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY15 target: 76% FY 14 Actual: 73.3%
SDW-01a	By FY2015, 95 percent of CWSs that have undergone a sanitary survey within the past three years (five years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules. State FY15 target: 79% FY 14 Actual: 99.9%
SDW-04	In FY2015, achieve a 89 percent fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF). State FY 14 Tsrget: 95% Not measured
SDW-05	The number of DWSRF projects that have initiated operations (cumulative). State FY 14 Target: 200 Not measured
SDW-11	Percent of DWSRF projects awarded to small PWSs serving <500, 501-3,300, and 3,301-10,000 consumers. <b>This is an indicator that HQ reports.</b>
SDW-15	Number and percent of small CWSs and NTNCWSs (<500, 501-3,300, 3,301-10,000) with repeat health-based Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR violations. <b>This is an indicator that HQ reports.</b>
SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards. <b>This is an indicator that HQ reports.</b>

OECA ACS code	<b>Goal 5: Compliance and Environmental Stewardship</b> <b>Subobjective 5.1.2: Address Environmental Problems from Water Pollution</b>
SDWA02	<p>During FY2014 and FY2015, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2014 and July 2015 ETT reports<sup>2</sup>.</p> <p>For FY 2014: IDEMs Commitment was 37 systems. End of year results in the July 2014 ETT show that IDEM addressed or returned to compliance 70 systems in FY 2014 (29 from the original 37 on the July 2013 fixed base list plus an additional 41 that had become priority systems after July 2013).</p> <p>For FY 2015: IDEMs Commitment was 34 systems. End of year results in the July 2015 ETT show that IDEM addressed or returned to compliance 58 systems in FY 2015.</p> <p>For FY 2016: IDEMs Commitment is 42 systems.</p>

<sup>1</sup> The information in Table A is based on draft FY2014-2015 OW and OECA measures at [http://water.epa.gov/resource\\_performance/planning/upload/Appendix-A-Measures.pdf](http://water.epa.gov/resource_performance/planning/upload/Appendix-A-Measures.pdf) and <http://www2.epa.gov/sites/production/files/documents/draftfy14oecanpmdnce.pdf> (Appendix I), respectively.

<sup>2</sup> A primacy agency's success at addressing violations will be tracked by means of the quarterly ETT reports. Numerical targets may be adjusted at mid-year. While it remains the ERP's goal that all of a priority system's violations will be returned to compliance, a primacy agency has met its commitment under the 2014-2015 SDWA ACS with respect to a priority system if the score for that system has been brought below, and remains below, eleven.